

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Bishop Wayne R. Felton, individually, and
The Holy Christian Church International,

Case No.: 0:23-cv467

Plaintiffs,

v.

DeMario Jives, Individually,

DeMario Media LLC, Individually

Defendants,

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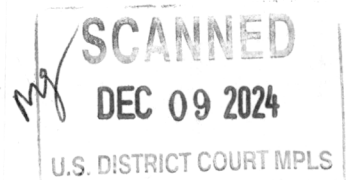
CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

Response to Plaintiff's Motion for Enforcement of Settlement
and for Sanctions

I, DeMario Jives, hereby submit this response to the Plaintiff's Motion for Enforcement of Settlement and for Sanctions. I intend to address the allegations made against me, provide clarifications, and assert that I have complied fully with the court's directives.

II. Affirmation of Compliance

1. I affirm that I have not sold, distributed, or transferred any information from my current vlogging or any other platform to any individual or entity.
2. I further affirm that I am not responsible for any third party, past, present, or future, who chooses to report, comment, or create content related to this case. Any commentary or actions by others are independent of me, and I bear no liability for their decisions.



III. Content Removal

In compliance with the court's directives, I have removed all content referencing Wayne Felton, his family, and his church. As stated in the court document submitted on December 6th, any content alleged to still be posted has been taken down and is no longer available.

IV. Misstatements in Plaintiff's Allegations

The Plaintiff has made several assertions that are factually incorrect:

1. The claim that I willfully violated the temporary restraining order is false.
2. The accusation that I posted a live-stream recording of the settlement conference is baseless. There is no tangible evidence, such as a link or video, to substantiate this claim.
3. The statement referencing my acknowledgment of viewers during a social media stream does not constitute evidence of any breach. Comments made on social media can be ambiguous and unrelated to the claims made by the Plaintiff.

V. Judge Schultz's Statements

During the November 12th hearing, Judge David Schultz explicitly confirmed that both parties could only speak about themselves and the settlement agreement. There was no indication that Wayne Felton could address related court proceedings. Judge Schultz further stated that any deviation from this would result in the matter returning to court. These points are reflected in the transcripts, which I respectfully request the court to review for clarity.

VI. Responsibility for Third-Party Actions

I reiterate that I am not responsible for third parties who may independently choose to discuss or comment on this matter. Any such content is beyond my control, and I bear no liability for the actions of other social media influencers or individuals.

VII. Final Declaration

I declare under penalty of perjury under the laws of the United States and the

State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Executed on this 7th day of December 2024, in Tampa, Florida, County of Hillsborough.

Respectfully submitted,
Prose: DeMario Jives